



Eric Holcomb, Governor  
State of Indiana

***Division of Disability and Rehabilitative Services***

***First Steps***

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October 4, 2024

Clare Mann  
Cluster B - 1<sup>st</sup> Kids  
500 N. Nappanee Street  
Suite 11B  
Elkhart, IN 46514

Dear Clare,

The Bureau of Child Development Services (BCDS) and the Quality Review (QR) Team would like to share the data from the 2023 monitoring visit. Data reviewed during this monitoring visit were for activities expected to have occurred by July 2023. This letter serves as your performance on compliance indicators as well as a finding if noncompliance was not met during our visit. These data will be shared in the FFY2023 State Performance Plan/Annual Performance Report (SPP/APR) submitted to the federal Office of Special Education Programs (OSEP) in February 2025.

**Summary Chart:**

<b>Federal and State Compliance Indicators</b>	<b>FFY2023 Cluster Data</b>	<b>FFY2022 Cluster Data</b>	<b>Target</b>	<b>FFY2023 State Data</b>
1. Timely Start (30 day) Initial and Annual	78.8% (52/66)	71.59% (63/88)	100%	80.4% (687/854)
7. Timely IFSPs (45-Day)	100% (40/40)	92.3% (60/65)	100%	97.6% (456/467)
8A. Transition Steps and Services	100% (55/55)	100% (56/56)	100%	97.4% (556/571)
8B. Notification to LEA of Potential Toddlers	96.4% (53/55)	96.4% (54/56)	100%	91.6% (523/571)
8C. Timely Transition Meeting	100% (55/55)	94.6% (53/56)	100%	93.3% (533/571)
15. Annual IFSP Written Prior to Expiration	100% (26/26)	100% (23/23)	100%	99.2% (384/387)

**Federal Compliance Measures:**

Below is the breakdown of the cluster's data by indicator. As a reminder, each finding must be corrected as soon as possible, and in no case later than one year from the date of this notification. BCDS must verify the cluster has corrected each finding of noncompliance by verifying the following:



- The cluster has corrected each individual case of child specific noncompliance unless the child is no longer within the jurisdiction of the program, and;
- The cluster is correctly implementing the specific regulatory requirements by achieving 100% compliance with the relevant IDEA requirement as based upon review of subsequent data which may be collected from subsequent desk reviews, onsite-monitoring, or a data base.

#### Federal Indicator #1 – **Timely Service Delivery**

The target for this indicator is 100%. For FFY 2023, BCDS found the cluster in **noncompliance** for this indicator. The requirement as referenced in **34CFR303.344(f)(1)** – Content of an IFSP- “The projected dates for initiation of the services in paragraph (d)(1) of this section as soon as possible after the IFSP meetings described in 303.342 . . .”

Cluster B’s performance was at 78.8% due to 14 children not receiving their services within a timely manner (30 days) and the finding issued in FFY2022 is sustained. BCDS has already verified that the 14 children received services although late or exited the program. Subsequent data will be run to determine if compliance has been met for this indicator. BCDS has full confidence Cluster B will be able to correct the deficiency. Technical assistance is available to assist the cluster in reaching this goal.

#### Federal Indicator #7 – **45 days from Referral to IFSP**

The target for this indicator is 100%. For FFY2023, BCDS found the cluster **met compliance** for this indicator. The requirement as referenced in **34CFR30.310(a)** - the initial IFSP meeting under §303.342 must be completed within 45 days from the date the lead agency or EIS provider receives the referral of the child.

#### Federal Indicator #8A – **Transition Steps and Services**

The target for this indicator is 100%. For FFY 2023, BCDS found the cluster **met compliance** for this indicator. The requirement as referenced in **34 CFR 303.344(h)(i)(ii)(iii)(2)(i)(ii)** - (h)Transition from Part C services. (1) The IFSP must include the steps and services to be taken to support the smooth transition of the child, in accordance with §§303.209 and 303.211(b)(6), from Part C services to-(i)Preschool services under Part B of the Act, to the extent that those services are appropriate; (ii)Part C services under §303.211; or (iii)Other appropriate services...”

#### Federal Indicator #8B – **Notification to the LEA of potential toddler**

The target for this indicator is 100% For FFY 2023, BCDS found the cluster in **noncompliance** for this indicator. The requirement as referenced in **34 CFR 303.344(h)(iii)(e)**- “Confirmation that child find information about the child has been transmitted to the LEA or other relevant agency, in accordance with §303.209(b)(and any policy adopted by the State under §303.401(e)) and, with parental consent if required under §303.414, transmission of additional information needed by the LEA to ensure continuity of services from the Part C program to the Part B program, including a copy of the most recent evaluation and assessments of the child and the family and most recent IFSP...”

Cluster B’s performance was at 96.4% due to 2 children not having documentation of 30-month notice to LEA in their file and a finding is issued though this letter. BCDS has already verified that the 2 children did get referred to the LEA although after the 30-month timeline. Subsequent data will be run to determine if compliance has been met for this indicator. BCDS has full confidence Cluster B will be able to correct the deficiency. Technical assistance is available to assist the cluster in reaching this goal.

**Federal Indicator #8C – Timely Transition Meeting**

The target is 100% for this indicator. For FFY 2023, BCDS found the cluster **met compliance** for this indicator. The requirement as referenced in **34 CFR 303.209(c)(1)**- “If a toddler with a disability may be eligible for preschool services under Part B of the Act, the lead agency, with the approval of the family of the toddler, convenes a conference, among the lead agency, the family, and the LEA not fewer than 90 days--and, at the discretion of all parties, not more than 9 months--before the toddler’s third birthday to discuss any services the toddler may receive under Part B of the Act...”

**State Indicator #15 – Annual IFSP Written Prior to Expiration**

The target for this indicator is 100%. For FFY 2023, BCDS found the cluster **met compliance** for this indicator. The requirement as referenced in 34 CFR 303.342(c)- “Annual meeting to evaluate the IFSP. A meeting must be conducted on at least an annual basis to evaluate and revise, as appropriate, the IFSP for a child and the child's family. The results of any current evaluations and other information available from the assessments of the child and family conducted under §303.321 must be used in determining the early intervention services that are needed and will be provided.”

**Additional Data Reviewed - Insurance Correctly Documented in Child File and EIHub**

The expectation for this data is 100%. For FFY 2023, BCDS found the cluster did **meet expectation** for this data. The requirement is for all insurance information listed in the EIHub data system be up to date and match what is collected in the child’s file maintained in the cluster’s file repository.

BCDS is committed to supporting the cluster’s efforts to improve outcomes for infants and toddlers with disabilities and their families, and we look forward to working with staff over the next year. Please contact me or the Quality Review Leader with any questions that you may have.

Sincerely,



Maggie McCall  
Indiana First Steps Quality Assurance Director  
Bureau of Child Development Services  
Division of Disability and Rehabilitative Services  
Office: 317-232-2027

Cc: Christina Commons (BCDS Director)  
Janet Ballard (Quality Review Leader)  
Brigitte Fairchild-Leazenby (1<sup>st</sup> Kids)